



July 20, 2023

**BY ECF**

Honorable Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**Re: *Ilaria Bulgari v. Veronica Bulgari*, No. 22 Civ. 5072 (LGS) (RWL)**

Dear Judge Schofield:

We write on behalf of Plaintiff Ilaria Bulgari pursuant to Your Honor's Individual Rule I.D.3 to respectfully seek leave to file under seal her letter responding to Defendant Veronica Bulgari's pre-motion letter in connection with the conference scheduled for July 26, 2023 [ECF No. 289]. The redacted portions of Plaintiff's letter contain material designated confidential by the Defendant and/or third parties during discovery. Plaintiff believes it would be appropriate to file her pre-motion letter without redaction but seeks leave to file the unredacted letter under seal in the first instance to give the designating parties an opportunity to seek permanent sealing.

Thank you for your consideration of this request.

Application DENIED without prejudice to renewal. The parties' confidentiality designations are not dispositive to the question of whether sealing is appropriate. By **March 12, 2024**, any party that wishes to maintain Dkt. 298 under seal may file a letter motion, not to exceed two pages, providing a basis for sealing that is sufficient under Second Circuit caselaw.

The Clerk of Court is respectfully directed to maintain Dkt. 298 under seal pending a potential renewal of the motion to seal, and to close the motion at Dkt. 296.

Dated: March 5, 2024  
New York, New York

Respectfully Submitted,

/s/ David Boies  
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A handwritten signature in black ink, appearing to read "Lorna G. Schofield", is written over a horizontal line.

**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

**BSF**

/s/ Peter M. Skinner

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CC: Defense counsel